

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Atmosphere Annealing, Inc.
1300 North Industrial Drive
North Vernon, Indiana 47265**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 079-11758-00011	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 25, 2001 Expiration Date: June 25, 2006

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permit Conditions	
SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
B.24	Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]	
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	

C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4, 5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Oil Quench Tanks and Shot Blast Units 25

Construction Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.6 Particulate Matter 10 Microns (PM₁₀) [326 IAC 2-8-4]
- D.1.7 VOC Emissions [326 IAC 8-1-6] [326 IAC 2-8-4]
- D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.9 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.10 Visible Emissions Notations
- D.1.11 Parametric Monitoring
- D.1.12 Dust Collector Inspections
- D.1.13 Broken or Failed Cartridge Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.14 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Insignificant Activities 30

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-2-4(a)]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Certification 31

Emergency Occurrence Report 32

Quarterly Deviation and Compliance Monitoring Report	34
---	-----------

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal heat-treating source.

Authorized Individual:	Rodney A. Reynolds
Source Address:	1300 North Industrial Drive, North Vernon, Indiana 47265
Mailing Address:	P.O. Box 220, North Vernon, Indiana 47265
General Source Phone Number:	(812) 346-1275
SIC Code:	3398
Source Location Status:	Jennings
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) oil quench tank, identified as 5&6 quench tank, constructed in 1993, exhausting to Stack 6-1, capacity: 3,200 pounds of steel parts per hour.
- (b) One (1) oil quench tank, identified as 9&10 quench tank, installed in 1998, exhausting to Stack Q9-1, capacity: 3,200 pounds of steel parts per hour.
- (c) One (1) oil quench tank, identified as 11&12 quench tank, installed in 1999, exhausting to Stack Q11-1, capacity: 2,800 pounds of steel parts per hour.
- (d) One (1) shot blast unit, identified as SB-1, exhausting to dust collector DC-1, installed before 1991, capacity: 7,500 pounds of steel parts per hour.
- (e) One (1) shot blast unit, identified as SB-2, exhausting to dust collector DC-2, installed before 1991, capacity: 10,500 pounds of steel parts per hour.
- (f) One (1) shot blast unit, identified as SB-3, exhausting to dust collector DC-3, to be installed in 2001, capacity: 10,500 pounds of steel parts per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Atmosphere Annealing, Inc.
North Vernon, Indiana
Permit Reviewer: EAL/MES

Page 6 of 45
OP No. F 079-11758-00011

- (1) One (1) boiler, identified as B-1, firing natural gas, installed before 1991, exhausting to Stack B-1, capacity: 3.08 million British thermal units per hour [326 IAC 6-2-4].
- (2) One (1) heating furnace, identified as #1, firing natural gas, installed before 1991, exhausting to Stack 1-1, capacity: 4.26 million British thermal units per hour.
- (3) One (1) temper furnace, identified as #2, firing natural gas, installed before 1991, exhausting to Stack 2-1, capacity: 2.82 million British thermal units per hour.
- (4) One (1) normalize furnace, identified as #4, firing natural gas, installed in 1996, exhausting to Stacks 4-1 and 4-2, capacity: 9.20 million British thermal units per hour.
- (5) One (1) furnace, identified as #5, firing natural gas, installed in 1994, exhausting to Stack 5-1, capacity: 3.06 million British thermal units per hour.
- (6) One (1) parts washer, identified as 5&6 washer, firing natural gas, installed in 1994, exhausting to Stack 6-1, capacity: 0.80 million British thermal units per hour.
- (7) One (1) furnace, identified as #6, firing natural gas, installed in 1994, exhausting to Stacks 6-1 and 6-2, capacity: 1.50 million British thermal units per hour.
- (8) One (1) furnace, identified as #7, firing natural gas, installed in 1995, exhausting to Stacks 7-1 and 7-2, capacity: 6.08 million British thermal units per hour.
- (9) One (1) temper furnace, identified as #8, firing natural gas, installed in 1997, exhausting to the plant interior, capacity: 1.5 million British thermal units per hour.
- (10) One (1) furnace, identified as #9, firing natural gas, installed in 1998, exhausting to Stack 9-1, capacity: 5.20 million British thermal units per hour.
- (11) One (1) parts washer, identified as 9&10 washer, firing natural gas, installed in 1998, exhausting to the plant interior, capacity: 1.50 million British thermal units per hour.
- (12) One (1) temper furnace, identified as #10, firing natural gas, installed in 1998, exhausting to Stack 10-1, capacity: 2.82 million British thermal units per hour.
- (13) One (1) furnace, identified as #11, firing natural gas, installed in 1999, exhausting to Stack 11-1, capacity: 3.14 million British thermal units per hour.
- (14) One (1) parts washer, identified as 11&12 washer, firing natural gas, installed in 1999, exhausting to the plant interior, capacity: 0.80 million British thermal units per hour.
- (15) One (1) temper furnace, identified as #12, firing natural gas, installed in 1999, exhausting to Stack 12-1, capacity: 1.45 million British thermal units per hour.
- (16) One (1) furnace, identified as #13, firing natural gas, installed in 1999, exhausting to Stack 13-1, capacity: 5.68 million British thermal units per hour.

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:

One (1) maintenance cold cleaner, identified as parts cleaner, installed in 1991, capacity: 0.1 gallons of solvent per day [326 IAC 8-3].

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking

and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year.

All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the

attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable

requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) **Emission Trades** [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) **Alternative Operating Scenarios** [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance

with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure

compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new

information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-

16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) oil quench tank, identified as 5&6 quench tank, constructed in 1993, exhausting to Stack 6-1, capacity: 3,200 pounds of steel parts per hour.
- (b) One (1) oil quench tank, identified as 9&10 quench tank, installed in 1998, exhausting to Stack Q9-1, capacity: 3,200 pounds of steel parts per hour.
- (c) One (1) oil quench tank, identified as 11&12 quench tank, installed in 1999, exhausting to Stack Q11-1, capacity: 2,800 pounds of steel parts per hour.
- (d) One (1) shot blast unit, identified as SB-1, exhausting to dust collector DC-1, installed before 1991, capacity: 7,500 pounds of steel parts per hour.
- (e) One (1) shot blast unit, identified as SB-2, exhausting to dust collector DC-2, installed before 1991, capacity: 10,500 pounds of steel parts per hour.
- (f) One (1) shot blast unit, identified as SB-3, exhausting to dust collector DC-3, to be installed in 2001, capacity: 10,500 pounds of steel parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS CONSTRUCTION CONDITION SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions for Proposed Facility (f)

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.1.2 Pursuant to IC 13-15-5-3, this Construction Condition section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Affidavit of Construction

- D.1.4 Pursuant to 326 IAC 2-5.1-3,

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ),

Permit Administration & Development Section.

- (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) shot blast unit, identified as SB-1, shall not exceed 9.94 pounds per hour when operating at a process weight rate of 7,500 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) shot blast unit, identified as SB-2, shall not exceed 12.5 pounds per hour when operating at a process weight rate of 10,500 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) shot blast unit, identified as SB-3, shall not exceed 12.5 pounds per hour when operating at a process weight rate of 10,500 pounds per hour.

These limitations are based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Compliance with these limits will make the requirements of 326 IAC 2-2 not applicable.

D.1.6 Particulate Matter 10 Microns (PM₁₀) [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions from the one (1) shot blast unit, identified as SB-1, shall not exceed 1.70 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions from the one (1) shot blast unit, identified as

SB-2, shall not exceed 2.37 pounds per hour.

- (c) Pursuant to 326 IAC 2-8-4, the PM_{10} emissions from the one (1) shot blast unit, identified as SB-3, shall not exceed 2.37 pounds per hour.

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.7 VOC Emissions [326 IAC 8-1-6] [326 IAC 2-8-4]

Any change or modification which would increase the potential to emit of VOC from any one of the three (3) quench tanks to twenty-five (25) tons per year or more, will require prior approval from IDEM, OAQ.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.9 Particulate Matter (PM)

In order to comply with Conditions D.1.5 and D.1.6, the dust collectors for PM control shall be in operation at all times when the three (3) shot blast units (SB-1, SB-2 and SB-3) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Visible Emissions Notations

- (a) Visible emission notations of each shot blast stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. Visible emissions notations are not required when venting indoors. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across each dust collector used in conjunction with the shot blasting process, at least once per shift, when the shot blasting process is in operation when venting to the atmosphere, and is not required when venting indoors. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each dust collector shall be maintained within the range of 2.0 and 5.0 inches of water or a range

established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.12 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all cartridges controlling the shot blasting process when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective cartridges shall be replaced.

D.1.13 Broken or Failed Cartridge Detection

In the event that cartridge failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment dust collectors, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of the amount of make-up oil added and recovered from each quench tank line.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain records of visible emission notations of each shot blast stack exhaust once per shift when venting to the atmosphere.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

- (2) Documentation of the dates vents are redirected.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain records of the results of the inspections required under Condition D.1.12 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) One (1) boiler, identified as B-1, firing natural gas, installed before 1991, exhausting to Stack B-1, capacity: 3.08 million British thermal units per hour.
- (b) One (1) maintenance cold cleaner, identified as parts cleaner, installed in 1991, capacity: 0.1 gallons of solvent per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4(a)]

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) boiler, identified as B-1, rated at 3.08 million British thermal units per hour, shall be limited to 0.6 pounds per million British thermal units.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Atmosphere Annealing, Inc.
Source Address: 1300 North Industrial Drive, North Vernon, Indiana 47265
Mailing Address: P.O. Box 220, North Vernon, Indiana 47265
FESOP No.: F 079-11758-00011

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Atmosphere Annealing, Inc.
Source Address: 1300 North Industrial Drive, North Vernon, Indiana 47265
Mailing Address: P.O. Box 220, North Vernon, Indiana 47265
FESOP No.: F 079-11758-00011

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 (The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 (The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Atmosphere Annealing, Inc.
Source Address: 1300 North Industrial Drive, North Vernon, Indiana 47265
Mailing Address: P.O. Box 220, North Vernon, Indiana 47265
FESOP No.: F 079-11758-00011

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Atmosphere Annealing, Inc.
P.O. Box 220
North Vernon, Indiana 47265

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal knowledge of the
(Company Name)
representations contained in this affidavit and am authorized to make these representations on behalf of
_____.
(Company Name)
4. I hereby certify that Atmosphere Annealing, 1300 North Industrial Drive, North Vernon, Indiana 47265, completed construction of the shot blast unit on _____ in conformity with the requirements and intent of the Federally Enforceable State Operating Permit (FESOP) application received by the Office of Air Management on January 8, 2001, and as permitted pursuant to **FESOP No. F 079-11758, Plant ID No. F 079-00011** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: Atmosphere Annealing, Inc.
Source Location: 1300 North Industrial Drive, North Vernon, Indiana 47265
County: Jennings
FESOP: F 079-11758-00011
SIC Code: 3398
Permit Reviewer: Edward A. Longenberger

On April 12, 2001, the Office of Air Quality (OAQ) had a notice published in the Plain Dealer and Sun, North Vernon, Indiana, stating that Atmosphere Annealing, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a metal heat-treating source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On April 30, 2001, Rick Burke, of Burke Engineering, on behalf of Atmosphere Annealing, Inc. submitted comments on the proposed FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The company respectfully requests that IDEM abandon any enforcement issue regarding shot blast #1 and #2 outlined in the Technical Support Document (TSD) of the referenced draft permit. The current status of the equipment results from the company's reliance on decisions and interpretations made by the regulators.

Review of our file documentation from October through December 1997 shows that Atmosphere Annealing provided IDEM with sufficient information about the equipment. If the documentation IDEM issued on December 30, 1997 did not address the shot blasts according to agency procedures, the current permit process has corrected the situation. The following synopsis highlights the critical details of October-December 1997.

On behalf of Atmosphere Annealing in October 1997, I asked IDEM to assist in determining what registrations or permits existed for the North Vernon plant. Since IDEM had no documents on file, Bob Ondrusek of IDEM requested a list of the equipment at the plant, along with installation dates and emissions, to use to determine which equipment required applications. The list was included in our November 6, 1997 submittal.

Before submitting the list of equipment, I spoke with Stacy Tsesser of IDEM about calculating shot blast emissions. She told me to base the shot blast emissions on the quantity of shot used in the blast. Since the North Vernon blasts are enclosed units that recirculate shot, I asked whether the weight of recirculated shot or the weight of makeup shot added to the unit should be used in the calculations. Ms. Tsesser told me to use the amount of makeup shot to calculate uncontrolled emissions. She also indicated that IDEM Rule 6-3-2 was federally enforceable and I used that equation

to calculate the potential emissions from the equipment.

After receiving our November 6, 1997 equipment list, Bob Ondrusek told me that equipment installed before the plant was purchased and unmodified since then was not subject to registration or permitting. IDEM did not request applications for furnaces #1 or #2 or shot blast #1.

As a result, the registration issued on December 30, 1997 did not address that equipment. However, it included other combustion equipment with lower capacities than furnaces #1 and #2. This action indicates that IDEM handled equipment installed before purchase differently than equipment installed after purchase.

IDEM's treatment of shot blast #2 also demonstrates IDEM's distinct approach for addressing equipment installed at the plant at the time of purchase. Initially, the company thought that shot blast #2 had been modified, as defined in the regulations, in 1997 as a result of a major rebuild of the equipment. This was reflected on the November 6 equipment list. When filing application forms, I informed IDEM that Atmosphere Annealing had discovered that the shot blast itself had not been modified but the dust collector had been replaced. Subsequently, Nisha Sizemore told me that IDEM would not process the application for shot blast #2. Based on this action, no application was filed for shot blast #1 because 1) IDEM had not requested one, 2) the unit had a lower capacity than #2 and 3) it was also installed before the time of purchase.

Although Atmosphere Annealing received a Letter of Warning on March 30, 1998 regarding this matter, the letter closed by indicating that no further action was necessary. For over two years, IDEM has not indicated otherwise. Based upon input received from Atmosphere Annealing counsel, the company has rightfully relied on this conclusion, and IDEM is simply estopped from pursuing this issue. Pending resolution of the issue, Atmosphere Annealing reserves the comments previously submitted during review of the permit.

Although Atmosphere Annealing wants to correct any irregularities in its permits and registrations, the above actions and their results do not constitute appropriate grounds for an enforcement action against the company. I certainly believe that after Atmosphere Annealing received the March 30, 1998 Letter of Warning from IDEM, no further action was expected by Atmosphere Annealing. We respectfully request that the enforcement matter be dropped from further consideration. For your convenience, we have enclosed our November 6, 1997 submittal and subsequent application form for shot blast #2.

Response 1:

IDEM, Office of Enforcement will take the above information into consideration. No change to the permit was made as a result of this comment.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description

Source Name:	Atmosphere Annealing, Inc.
Source Location:	1300 North Industrial Drive, North Vernon, Indiana 47265
County:	Jennings
SIC Code:	3398
Operation Permit No.:	F 079-11758-00011
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a FESOP application from Atmosphere Annealing, Inc. relating to the operation of a metal heat-treating source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) oil quench tank, identified as 5&6 quench tank, constructed in 1993, exhausting to Stack 6-1, capacity: 3,200 pounds of steel parts per hour.
- (b) One (1) oil quench tank, identified as 9&10 quench tank, installed in 1998, exhausting to Stack Q9-1, capacity: 3,200 pounds of steel parts per hour.
- (c) One (1) oil quench tank, identified as 11&12 quench tank, installed in 1999, exhausting to Stack Q11-1, capacity: 2,800 pounds of steel parts per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units. These units were already existing when Atmosphere Annealing bought the plant in 1991.

- (d) One (1) shot blast unit, identified as SB-1, exhausting to dust collector DC-1, installed before 1991, capacity: 7,500 pounds of steel parts per hour.
- (e) One (1) shot blast unit, identified as SB-2, exhausting to dust collector DC-2, installed before 1991, capacity: 10,500 pounds of steel parts per hour.

Atmosphere Annealing, Inc.
North Vernon, Indiana
Permit Reviewer: MES

Page 2 of 15
F 079-11758-00011

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (f) One (1) shot blast unit, identified as SB-3, exhausting to dust collector DC-3, to be installed in 2001, capacity: 10,500 pounds of steel parts per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) boiler, identified as B-1, firing natural gas, installed before 1991, exhausting to Stack B-1, capacity: 3.08 million British thermal units per hour [326 IAC 6-2-4].
 - (2) One (1) heating furnace, identified as #1, firing natural gas, installed before 1991, exhausting to Stack 1-1, capacity: 4.26 million British thermal units per hour.
 - (3) One (1) temper furnace, identified as #2, firing natural gas, installed before 1991, exhausting to Stack 2-1, capacity: 2.82 million British thermal units per hour.
 - (4) One (1) normalize furnace, identified as #4, firing natural gas, installed in 1996, exhausting to Stacks 4-1 and 4-2, capacity: 9.20 million British thermal units per hour.
 - (5) One (1) furnace, identified as #5, firing natural gas, installed in 1994, exhausting to Stack 5-1, capacity: 3.06 million British thermal units per hour.
 - (6) One (1) parts washer, identified as 5&6 washer, firing natural gas, installed in 1994, exhausting to Stack 6-1, capacity: 0.80 million British thermal units per hour.
 - (7) One (1) furnace, identified as #6, firing natural gas, installed in 1994, exhausting to Stacks 6-1 and 6-2, capacity: 1.50 million British thermal units per hour.
 - (8) One (1) furnace, identified as #7, firing natural gas, installed in 1995, exhausting to Stacks 7-1 and 7-2, capacity: 6.08 million British thermal units per hour.
 - (9) One (1) temper furnace, identified as #8, firing natural gas, installed in 1997, exhausting to the plant interior, capacity: 1.5 million British thermal units per hour.
 - (10) One (1) furnace, identified as #9, firing natural gas, installed in 1998, exhausting to Stack 9-1, capacity: 5.20 million British thermal units per hour.
 - (11) One (1) parts washer, identified as 9&10 washer, firing natural gas, installed in 1998, exhausting to the plant interior, capacity: 1.50 million British thermal units per hour.
 - (12) One (1) temper furnace, identified as #10, firing natural gas, installed in 1998, exhausting to Stack 10-1, capacity: 2.82 million British thermal units per hour.

- (13) One (1) furnace, identified as #11, firing natural gas, installed in 1999, exhausting to Stack 11-1, capacity: 3.14 million British thermal units per hour.
- (14) One (1) parts washer, identified as 11&12 washer, firing natural gas, installed in 1999, exhausting to the plant interior, capacity: 0.80 million British thermal units per hour.
- (15) One (1) temper furnace, identified as #12, firing natural gas, installed in 1999, exhausting to Stack 12-1, capacity: 1.45 million British thermal units per hour.
- (16) One (1) furnace, identified as #13, firing natural gas, installed in 1999, exhausting to Stack 13-1, capacity: 5.68 million British thermal units per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:

One (1) maintenance cold cleaner, identified as parts cleaner, installed in 1991, capacity: 0.1 gallons of solvent per day [326 IAC 8-3].

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 079-2984-00011, issued on February 23, 1994;
- (b) CP 079-9221-00011, issued on December 30, 1997; and
- (c) CP 079-10792-00011, issued on May 18, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

CP 079-10792-00011, issued on May 18, 1999

Condition 2: This condition outlines operating conditions for a conveyORIZED degreasing facility, pursuant to 326 IAC 8-3-4.

Reason not incorporated: The only degreasing facility present at the source is a cold cleaner, and not a conveyORIZED degreasing facility. Therefore, the unit will be subject to the conditions of 326 IAC 8-3-2.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the dust collectors for the two (2) unpermitted shot blast units and the one (1) new shot blast unit be considered as an integral part of the shot blasting process:

- (a) The material recovered by the dust collectors has commercial value as ferrous scrap.
- (b) Since the shot blast is exhausted to the plant interior, the dust collectors would be necessary even if no air quality regulations were in place in order to maintain OSHA standards and a productive workplace environment. Furthermore, if the shot blast exhausted outdoors, control equipment would be necessary to prevent damage to property near the plant from iron oxide

and other particulate matter.

IDEM, OAQ has evaluated the justifications and determined that the dust collectors will not be considered as an integral part of the shot blasting process. Although the material recovered by the control equipment has some limited commercial value (about \$2000 per year), the collected matter is not considered the primary product of the manufacturing processes at Atmosphere Annealing. Moreover, the fact that the shot blasting units can operate without the dust collectors leads IDEM, OAQ to conclude that the dust collectors cannot be considered as an integral part of the process. While the control equipment may be necessary to maintain employee health and avoid property damage, this only makes the control equipment necessary, and not integral. Therefore, the permitting level will be determined using the potential to emit before the dust collectors.

Enforcement Issue

- (a) IDEM is aware that the two (2) shot blast units SB-1 and SB-2 were operated without the proper approval from the time when Atmosphere Annealing purchased the plant in 1991 until CP 079-9221-00011 was issued on December 30, 1997. The source did indicate the shot blast units in the 1997 application, but OAQ did not include them in the registration. A Letter of Warning was issued to the source on March 30, 1998, which stated that the facility was operated without the proper approval.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on January 11, 2000. Additional information was received on October 23, 2000, January 8, 2001, and March 16, 2001.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1061
PM ₁₀	108
SO ₂	0.139
VOC	60.5
CO	19.5
NO _x	23.2

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	0.0005
Dichlorobenzene	0.0003
Formaldehyde	0.017
Hexane	0.417
Toluene	0.0008
Lead Compounds	0.0001
Cadmium Compounds	0.0003
Chromium Compounds	0.0003
Manganese Compounds	0.00009
Nickel Compounds	0.0005
TOTAL	0.437

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Quench Tanks	0.00	0.00	0.00	59.1	0.00	0.00	0.00
Shot Blast Units	153	28.2	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.440	1.76	0.139	1.39	19.5	23.2	0.417/ 0.437
Total Emissions	153	30.0	0.139	60.5	19.5	23.2	Single <10 Total <25

County Attainment Status

The source is located in Jennings County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The one (1) boiler, identified as B-1, firing natural gas, rated at 3.08 million British thermal units per hour, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc), since it has a heat input capacity less than ten (10) million British thermal units per hour.

Atmosphere Annealing, Inc.
North Vernon, Indiana
Permit Reviewer: MES

Page 8 of 15
F 079-11758-00011

- (b) The one (1) maintenance cold cleaner, identified as parts cleaner, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, Halogenated Solvent Cleaning, because the facility does not use any halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Jennings County and the potential to emit CO, VOC, NO_x or SO₂ is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM₁₀ is less than one hundred (100) tons per year, including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂, VOC, CO and NO_x shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year.

The following limits will ensure that PM₁₀ emissions are less than one hundred (100) tons per year:

- (a) The PM₁₀ emissions from the one (1) shot blast unit, identified as SB-1, shall not exceed 1.70 pounds per hour;
- (b) The PM₁₀ emissions from the one (1) shot blast unit, identified as SB-2, shall not exceed 2.37 pounds per hour; and
- (c) The PM₁₀ emissions from the one (1) shot blast unit, identified as SB-3, shall not exceed 2.37 pounds per hour.

Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) boiler, identified as B-1, constructed before 1991, rated at 3.08 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$P_t = 1.09/Q^{0.26}$$

where:

P_t = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 million British thermal units per hour, P_t shall not exceed 0.6.

$P_t = 0.6$ lb/MMBtu heat input

Based on Appendix A, the potential PM emission rate is:

$$0.440 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.1 \text{ lb/hr}$$
$$(0.1 \text{ lb/hr} / 3.08 \text{ MMBtu/hr}) = 0.032 \text{ lb PM per MMBtu}$$

Therefore, the one (1) boiler, identified as B-1, will comply with this rule.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) shot blast unit, identified as SB-1, shall not exceed 9.94 pounds per hour when operating at a process weight rate of 7,500 pounds per hour (3.75 tons per hour).

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$

The dust collector shall be in operation at all times the one (1) shot blast unit, identified as SB-1 is in operation, in order to comply with this limit. The PM emissions after controls are 0.637 pounds per hour, which is less than the allowable PM emission rate of 9.94 pounds per hour. Therefore, the one (1) shot blast unit, identified as SB-1, is in compliance with this rule.

Atmosphere Annealing, Inc.
North Vernon, Indiana
Permit Reviewer: MES

Page 11 of 15
F 079-11758-00011

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) shot blast unit, identified as SB-2, shall not exceed 12.5 pounds per hour when operating at a process weight rate of 10,500 pounds per hour (5.25 tons per hour).

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

The dust collector shall be in operation at all times the one (1) shot blast unit, identified as SB-2 is in operation, in order to comply with this limit. The PM emissions after controls are 0.892 pounds per hour, which is less than the allowable PM emission rate of 12.5 pounds per hour. Therefore, the one (1) shot blast unit, identified as SB-2, is in compliance with this rule.

- (c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) shot blast unit, identified as SB-3, shall not exceed 12.5 pounds per hour when operating at a process weight rate of 10,500 pounds per hour (5.25 tons per hour).

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

The dust collector shall be in operation at all times the one (1) shot blast unit, identified as SB-3 is in operation, in order to comply with this limit. The PM emissions after controls are 0.892 pounds per hour, which is less than the allowable PM emission rate of 12.5 pounds per hour. Therefore, the one (1) shot blast unit, identified as SB-3, is in compliance with this rule.

Compliance with these hourly PM limits will also make the requirements of 326 IAC 2-2 not applicable.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The potential to emit of VOC from each of the three (3) quench tanks (5&6 quench tank, 9&10 quench tank, 11&12 quench tank), is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Any change or modification which would increase the potential to emit of VOC from any one of the three (3) quench tanks to twenty-five (25) tons per year or more, will require prior approval from IDEM, OAQ.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of the one (1) cold cleaner, identified as parts cleaner, shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;

- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements; and
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Condition 2 of CP 079-10792-00011, issued on May 18, 1999, contained operating conditions for a conveyorized degreasing facility, pursuant to 326 IAC 8-3-4. However, the only degreasing facility present at the source is a cold cleaner, and not a conveyorized degreasing facility. Therefore, the requirements of 326 IAC 8-3-2 supercede those of Condition 2 in CP 079-10792-00011.

Testing Requirements

No testing is required for this source. Shot blast emissions were calculated using AP-42 emission factors. Quench tank emissions are based on the mass balance calculation that the rate of make-up oil added to the quench tanks minus the rate of oil recovered by the parts washers is equal to the rate of VOC emission.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The shot blast units have applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of each shot blast stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. Visible emissions notations are not required when venting indoors. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained

employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) The Permittee shall record the total static pressure drop across each dust collector used in conjunction with the shot blasting process, at least once per shift when the shot blasting process is in operation when venting to the atmosphere, and is not required when venting indoors. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each dust collector shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (c) An inspection shall be performed each calendar quarter of all dust collectors controlling the shot blasting operation when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridges shall be replaced.
- (d) In the event that cartridge failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) For single compartment dust collectors, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the dust collectors for the shot blasting processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this metal heat-treating source shall be subject to the conditions of the attached proposed FESOP No.: **F 079-11758-00011**.

Appendix A: Emissions Calculations

Page 1 of 4 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

All Natural Gas Fired Units

Company Name: Atmosphere Annealing, Inc.
Address City IN Zip: 1300 N. Industrial Drive, North Vernon, Indiana 47265
FESOP: 079-11758
Plt ID: 079-00011
Reviewer: Edward A. Longenberger
Date: January 11, 2000

Unit	Capacity (MMBtu/hr)
#1	4.26
B-1	3.08
#2	2.82
#4	9.20
#5	3.06
5&6 washer	0.80
#6	1.50
#7	6.08
#8	1.50
#9	5.20
9&10 washer	1.50
#10	2.82
#11	3.14
11&12 washer	0.80
#12	1.45
#13	5.68
Total	52.89

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

52.89

463.32

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.440	1.76	0.139	23.2	1.27	19.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Page 2 of 4 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

All Natural Gas fired units

HAPs Emissions

Company Name: Atmosphere Annealing, Inc.
Address City IN Zip: 1300 N. Industrial Drive, North Vernon, Indiana 47265
FESOP: 079-11758
Pit ID: 079-00011
Reviewer: Edward A. Longenberger
Date: January 11, 2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.865E-04	2.780E-04	1.737E-02	4.170E-01	7.876E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.158E-04	2.548E-04	3.243E-04	8.803E-05	4.865E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: State Potential Emissions Calculations
Degreasing and Oil Quenching

Page 3 of 4 TSD App A

Company Name: Atmosphere Annealing, Inc.
Address City IN Zip: 1300 North Industrial Drive, North Vernon, Indiana 47265
FESOP: 079-11758
Plt ID: 079-00011
Reviewer: Edward A. Longenberger
Date: January 11, 2000

Degreasing

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Gal of Mat (gal/day)	Potential VOC (lb/day)	Potential VOC (ton/yr)
CL-1 Stoddard Solvent	6.5	100.00%	0.0%	100.0%	0.1	0.654	0.119
State Potential Emissions						0.654	0.119

METHODOLOGY

Potential VOC Pounds per Day = Solvent Density (lbs/gallon) * weight % volatiles * solvent consumption (gallons/day)

Potential VOC Tons per Year = Potential VOC Pounds per Day * (365 days/yr) * (1 ton/2000 lbs)

Oil Quenching

Unit ID	VOC Emissions (lb/hr)	VOC Emissions (tons/yr)
5 & 6 quench tank	4.70	20.6
9 & 10 quench tank	4.70	20.6
11 & 12 quench tank	4.10	18.0
Total	13.5	59.1

METHODOLOGY

Emission rate in lb/hr = Applicant supplied emission data based on the rate of make-up oil added to the quench tanks minus the amount of oil recovered.

Emission Rate in tons/yr = Emission Rate (lbs/hr) x (8760 hr/yr) x (ton/2000 lb)

Appendix A: Emission Calculations
Shot Blast Emissions and Total Source Emissions Summary

Page 4 of 4 TSD App A

Company Name: Atmosphere Annealing, Inc.
Address City IN Zip: 1300 North Industrial Drive, North Vernon, Indiana 47265
FESOP: 079-11758
Pit ID: 079-00011
Reviewer: Edward A. Longenberger
Date: January 11, 2000

Shot Blast Emissions

Unit ID	Throughput (tons iron/hr)	Pollutant	Emission Factor (lb/ton produced)	Potential Emissions (ton/yr)	Control Efficiency (%)	Emissions After Control (lb/hr)	Emissions After Control (ton/yr)
Shot Blast SB-1	3.75	PM	17.00	279.23	99.00%	0.637	2.79
		PM-10	1.70	27.92	99.00%	0.064	0.279
Shot Blast SB-2	5.25	PM	17.00	390.92	99.00%	0.892	3.91
		PM-10	1.70	39.09	99.00%	0.089	0.391
Shot Blast SB-3	5.25	PM	17.00	390.92	99.00%	0.892	3.91
		PM-10	1.70	39.09	99.00%	0.089	0.391
			PM Total	1061	99.00%	2.42	10.6
			PM-10 Total	106	99.00%	0.242	1.06

METHODOLOGY

Emission factors from FIRE version 6.22, SCC 3-04-003-40.

Total Source Emissions Summary

Emissions before controls

Emission Unit	PM Potential Emission (tons/yr)	PM-10 Potential Emission (tons/yr)	SO2 Potential Emission (tons/yr)	NOx Potential Emission (tons/yr)	VOC Potential Emission (tons/yr)	CO Potential Emission (tons/yr)
Quench Tanks	0.00	0.00	0.00	0.00	59.1	0.00
Combustion Units	0.440	1.76	0.139	11.6	1.27	19.5
Shot Blast Units	1061	106	0.00	0.00	0.00	0.00
Degreasing Operations	0.00	0.00	0.00	0.00	0.119	0.00
Total	1061	108	0.139	11.6	60.5	19.5

Emissions after controls

Emission Unit	PM Potential Emission (tons/yr)	PM-10 Potential Emission (tons/yr)	SO2 Potential Emission (tons/yr)	NOx Potential Emission (tons/yr)	VOC Potential Emission (tons/yr)	CO Potential Emission (tons/yr)
Quench Tanks	0.00	0.00	0.00	0.00	59.1	0.00
Combustion Units	0.440	1.76	0.139	11.6	1.27	19.5
Shot Blast Units	10.6	1.06	0.00	0.00	0.00	0.00
Degreasing Operations	0.00	0.00	0.00	0.00	0.119	0.00
Total	11.0	2.82	0.139	11.6	60.5	19.5